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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS JUNE
15, 2017 LETTER BRIEF REGARDING
PRIVILEGE ISSUES**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal confidential information in portions of its June 15, 2017 Letter Brief Regarding Privilege Issues (“Letter Brief”). Specifically, Waymo requests an order granting leave to file under seal the portions of the document as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Letter Brief	Portions highlighted in blue	Defendants
Exhibits 1-3 and 13 to the Declaration of Kevin Smith	Entire Documents	Defendants

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. DEFENDANTS’ CONFIDENTIAL INFORMATION

Waymo has filed portions of its Letter Brief under seal because it contains information that Defendants have designated confidential. With respect to Exhibits 1-3 and 13 to the Smith Declaration, Defendants have stated that they do not consider their privilege logs confidential, but nevertheless do not want their clients’ email addresses made public.¹ Accordingly, Waymo has filed Exhibits 1-3 and 13 to the Declaration of Kevin Smith completely under seal so Defendants can determine which email addresses, if any, merited sealing. Waymo takes no position as to the merits of sealing any of Defendants’ material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

III. CONCLUSION

For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s

¹ Waymo notes that some, but not all, of the email addresses on Defendants’ logs are already public because they are attorney work addresses, which can be accessed from the attorneys’ respective firm websites.

1 Administrative Motion.

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3 DATED: June 16, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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5 By /s/ Charles K. Verhoeven

Charles K. Verhoeven

6 Attorneys for WAYMO LLC
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